

Appendix 1: Officer Responses to Ngāti Toa feedback on pre-notification draft of Change 1 to the RPS

Section	Provision	Summary of Feedback Received	Response
	Overarching	General comment regarding the methods and the involvement of tangata whenua in the implementation of policies in the Regional Policy Statement: Method 32, 37 and 38. The methods (some more than the others) outlined under the Subject 'Resource Management with Tangata Whenua' should be used and applied to other topics in the RPS. The methods, Method 32, Method 37, and Method 38 are such like and cannot see these spelled out in important topics 'Climate Change', 'Regional Form, design and function', 'Natural Hazards', 'Soils and Minerals'. Suggest adding these methods into these topics.	Agreed. Due to timing constraints we have only just started the work to assess these properly. Method 32 has generally been included where it is needed, but Methods 37 and 38 have not yet been picked up in the new topics.
	Overarching	This document comes at the back of a partnership planning Kaupapa agreement Te Rūnanga o Toa Rangatira has signed with the Greater Wellington Regional Council Environment Planning team last year. This agreement enabled our close working relationship with the Environment Planning team in the GWRC and we did give prior feedback to topic leads, in the RPS draft being produced - it is a great opportunity for the Rūnanga to be involved in drafting and creating content for the Regional Policy Statement. Kei te mihi nui to GWRC team that made this partnership possible; as we acknowledge this partnership, we were able to generate a working partnership as part of this agreement which enabled us to be involved at the detailed planning level and boosted our resourcing and Resource Management Planning expertise. This is a major milestone. We are able to provide you with technical content for the draft Regional Policy Statement for the Wellington Regional Council.	Noted.
	Overarching	The wording of Objective 31 can be strengthened to mean: <i>the demand for mineral resources is met from resources located in close proximity to the areas of demand - in an appropriate way we can reduce its footprint.</i> The Objective should not encourage further mining, and the wording could somewhat contain the need of mining and its footprint. This objective should not read to encourage mining activities further.	Objective 31 not in scope of RPS Change 1. The review of this Objective should occur as part of RPS review in 2023/24.
	Overarching	<i>Historic Heritage Policy 21 and Policy 22:</i> We are unsure whether Policy 21 and 22 make a distinguished note between the historic heritage and Sites and Areas of Significance to Māori (SASM) identification and mapping and protection. They should be separated - or the policy 21 and 22 to be worded to ensure that distinguishing features are identified and comes across in the paragraph.	Historic heritage not in scope of RPS Change 1. The review of these provisions should occur as part of RPS review in 2023/24.
	Overarching	Policy 6 recognises the significance of Porirua Harbour. This could be further discussed.	Coastal chapter not in scope of RPS Change 1. A fuller review in 2024 will pick this up. This policy has been given effect to in the NRP, and will be addressed through NRPC1.
	Overarching	<i>Policy 48 Principles of the Treaty of Waitangi</i> provides a generic explanation what the applicants need to provide and what the consideration would be from the perspective of resource consent issuer. Deed of Settlement Acts should be clause (c) and any other evidence that are provided such as, Cultural Impact Assessments and iwi environmental management plans.	Noted, and accepted in part. Deleting or amending these explanations created an inconsistency in the plan change in terms of scope. We agree that making changes to these provisions before we can work together on them is inappropriate.
	Overarching	Explanations for Policy 48 (Principles of the Treaty of Waitangi) and Policy 49 (Recognising and providing for matters of significance to tangata whenua) have been removed. These are beneficial explanations which provide greater context for policies. These explanations discuss how Māori values and sites of significance should be considered. If these explanations are going to be put somewhere else there should be guidance on where to find them.	Noted, and accepted in part. Deleting or amending these explanations created an inconsistency in the plan change in terms of scope. We agree that making changes to these provisions before we can work together on them is inappropriate.
3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional	Overarching Objective A:	Objective 3 (2) uses the phrase 'Te Ao Māori and Mātauranga Māori have not been given sufficient weight in decision-making'. This phrase can be reworded to say: 'Te Ao Māori and Mātauranga Māori have been given limited and in some cases no weight from the governance level through the implementation.' It is encouraging to see the value of mātauranga Māori being recognised in the Objective 3 A (a). It seems this objective only recognises mātauranga as a knowledge system with evidence. The Objective 3 A (a) can be improved to recognise the resource management methodologies within mātauranga. We recommend that there is more recognition of the significant role that Māori have of kaitiakitanga, the obligation of care and protection for the environment, and the importance for Māori to have the ability to	Noted. Issue 3 has been amended to reflect part of your drafting: "Mana whenua / tangata whenua values, Te Ao Māori and mātauranga Māori have not been given sufficient weight in decision-making, including from governance level through to the implementation..." We have strengthened the role that Māori has of kaitiakitanga. Suggested wording (f) not included, as the proposed wording is more suitable for a policy. A couple of policies and a method capture the intent of the proposed wording, including Policy IE.1, Policy IE.2, and Policy UD.1.

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Policy Statement		<p>carry out this role.</p> <p>Objective A mentions 'integrated and respectful environmental stewardship'. Does the reference to stewardship is written to mean the Crown? If this means to say kaitiakitanga, the text needs to be clear separating these. Objectives from (a) to (e) do not mention how Objective A will be implemented with Mana Whenua; an additional clause (f) could be inserted and could mean to say: <i>co-designs with Mana Whenua and iwi how Te Ao Māori and Mātauranga will be used, and responds to Mana Whenua and iwi principles and values and aspirations delivering environmental outcomes.</i></p> <p>Objective A(e) aims to respond effectively to pressures such as, climate change. However, these are not only future pressures but pressures we currently experience. We recommend rewording this objective as to read 'responds effectively to the current and future pressures of climate change, population growth and development.'</p>	Inserted the suggested wording for (e).
3.1 Climate Change	Issue 4:	<p>Decision requested:</p> <p>[Issues] 3.1.A 4 and 5 are connected but yet still, they seem to be disconnected the way they are worded. Under the Objective [Issue?] 3.1.A 4 'The impacts and costs of responding to climate change will not be felt equitably.' This is more so for iwi and Māori and needs to be clearer in the text to say, '...will not be felt equitably, especially iwi and Māori.'</p> <p>If the policy intention of the Objective 3.1.A 4 was to highlight inequities, this can also be mentioned under the Objective 3.1.A 5. Then the Objective could reflect the inter-racial and inter-generational inequities that are generated within the Resource Management System and its decision-making mechanisms, which will in return impact more of our communities when dealing with Climate Change.</p>	Amended.
3.1 Climate Change	3.1A	<p>Decision requested:</p> <p>We note that there is placeholder introductory text to be coming for this Objective. This text will be crucial to express the different impacts our whānau and communities will face from Climate Change.</p>	Noted.
3.1 Climate Change	Objective CC.1	<p>Decision requested:</p> <p>This objective is supported in part that it may not be intuitive for people to take it to next level, in terms of what the objective means and how we are supposed to give effect. This is also valid for consent planners as they take direction from higher order documents. There is Mana Whenua missing from this objective, where any decision regarding what the Objective CC.1 is trying to achieve is co-governed and co-designed with iwi and Māori. Iwi and Māori aspirations and values are not jeopardised and threatened by the said immediate, rapid, and large-scale changes.</p>	<p>Equitable transition for Māori addressed in IM policy – objective Central Govt will be developing Just transition Māori Strategy.</p> <p>Also note changes to Objective CC.6.</p> <p>The content has been split into 2 objectives and formatted for better clarity, responding to feedback that there were a number of concepts contained within the original single objective.</p> <p>The new objective CC.1A splits out the issue of fairness and equity, and now expresses this in the context of RMA well-being language.</p>
3.1 Climate Change	Objective CC.3	<p>Decision requested:</p> <p>The <i>nature-based solutions</i> suggest that there are a handful of proven and trustworthy solutions and proposals in place to responding to Climate Change. However, if looked closer, this objective targets increasing planting practices, as well as the planting extent that aims to achieve multiple outcomes as a core part of climate change adaptation. It is encouraging to see the role of increasing our forest cover and ecosystems, however the current phrasing and content of the Objective and what is actually meant, could lead to misunderstanding of offering less of a kete of larger solutions.</p> <p>The consideration behind preparing forest spatial plans seem to align with the intention of increasing forest cover for climate change adaptation purposes. However, it is unclear whether such exercise is time and resource intensive and could draw us away from the implementation path. Another question regarding spatial forest plans is that how this impacts on land ownership and land use.</p>	<p>Objective is much broader than increasing forest cover – its intent is to protect and restore natural systems and infrastructure to address climate change and at the same time provide benefits to biodiversity and natural ecosystems.</p> <p>Increasing forest extent, preferably indigenous forest, is just one on the approaches being promoted.</p> <p>Regional Spatial Plan aligns with direction of NBA – the aim is to identify areas where increased forest is most appropriate and promote this. There is no intent, nor ability, to require any landowners to plant forest.</p>
3.1 Climate Change	Objective CC.4	<p>Decision requested:</p> <p>This objective can be strengthened from 'recognises and provides for', especially considering Policy 29, Policy 51, Policy 52, and CC.13 being non-regulatory, specifying how these policies performed and whether the current wording would improve the status quo. Since the first generation regional and district plans, the</p>	Objective strengthened with emphasis on resource management and adaptation planning, Policies CC.19, CC.19A and methods will provide the tools to achieve this outcome.

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		objectives could not avoid inappropriate subdivision and development in natural hazard overlays, and in some cases, plans could not deliver the objective of reducing the risk and consequences faced from natural hazards. Looking at Policy 52 to deliver this Objective, somewhat contradicts the strength of the Objective CC.4. Given that Policy CC.13 is also non-regulatory, the regulatory impact of CC.4 can be diluted in the consent process. 'recognises and provides for' could be redrafted to say ' <i>Land use planning will respond with appropriate tools and practices...</i> '	
3.1 Climate Change	Objective CC.5	Decision requested: Objective CC.5 is powerful in the sense that a Regional Policy Statement could impact the behavior strongly- however the Objective is implemented with <i>Policy CC.19 climate change adaptation strategies</i> which is a non-regulatory instrument. Can this objective be used in land use planning practices?	Retain unchanged.
3.3 Energy infrastructure and waste	3.3	Decision requested: Objective 11 The quantity of waste disposed of is reduced Objective 11 could be worded to express a stronger behavioral direction to say: <i>the quantity of waste disposed of is reduced to ultimately remove our reliance on landfills</i> . Policy 65 is non-regulatory for the extent of the Objective. To be able to remove our reliance on landfills, a policy that is regulatory will be required.	Objective 11 not in scope of RPS Change 1. The review of this Objective should occur as part of RPS review in 2023/24, including whether any regulatory policies are required. However, Policy 65 and Method 17 have been amended / broadened to further support actions that will reduce reliance on landfills.
3.3 Energy infrastructure and waste	3.3	Decision requested: It is surprising to see the text used in 2013 when the RPS became operative has not changed, since New Zealand in particular, and world in general are going through some major events, that will fundamentally impact our energy use, food demand, and transport. Particularly, the third paragraph that refers to energy demand from all sectors continuing to grow, and with the most significant growth coming from transport. Seeing a raft of Objectives on Climate Change being introduced in this RPS, Section 3.3 is not well connected to these objectives. Global oil demand is changing with the invasion of Ukraine and we are living in a world where food scarcity is a real prospect. Our choice of energy will be impacted by these developments. The introductory text does not refer to this new contextual environment and reads as if we still need to grow our requirements of energy and therefore, associated emissions. Paragraph six that refers to our international obligations on reducing our emissions; reads as the core reason of reducing our emissions in New Zealand. We are not necessarily reducing our emissions because of our international obligations. Paragraph eight refers to 2007 and 2008 Government's Energy strategies and is not reflecting the latest policies and documents that are associated with this section. The latest New Zealand Energy Strategy is 2011-2021 and there are plans for a new one to be released in 2024. Section (b) and Section (c) that refers to infrastructure and waste, do not connect the dots about how infrastructure and waste has been dealt with through the RPS. The issue analysis, for instance, in these sections do not link the issues Tangata Whenua face regarding these subject-matters. For instance, the analysis of waste issues do not refer how connected this issue to infrastructure and three waters network management. These issues pop in consent applications and processes which are the inappropriate processes for them to be addressed. (2) Regarding the infrastructure section, it seems the discussion focus is the barriers that infrastructure faces rather than its broader context. (3) Regarding the waste section, a most up to date issue definition is needed, as the system is still requiring landfill consent applications for addressing waste management, although the RPS is aspiring to lessen the need for new landfills.	There are only minor changes proposed for Chapter 3.3 in RPS Change 1 to remove paragraph 8 of the introduction (which you noted was out of date), and consequential changes to Table 3. A review of the Chapter in full should occur as part of RPS review in 2023/24. We are keen to continue korero with you in shaping these provisions.
3.6 Indigenous ecosystems	Issue 3:	Decision requested: Iwi and landowner values-roles are not adequately recognised and provided for. These are two different matters and need to be decoupled on page 29. It would invite confusion to bring two matters in one phrase.	The separation of the values and roles of mana whenua and landowners and communities is made at the policy level.
3.6 Indigenous ecosystems	Objective 16B:	Decision requested: Objective 16B is supported specifically <i>recognising Mana Whenua values relating to indigenous biodiversity and these values are given effect to in decision-making and the roles of mana whenua as kaitiaki are supported and resourced</i> . The use of Policy IE.2 and Policy IE.3 is also fundamental to achieve this objective.	Support noted

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3.11 Soils and minerals	Objective 29A:	Decision requested: It is encouraging to see an objective that is aiming to increase the resilience of the land. The policies to implement this objective seems to be limited to forest cover and extent. Was there any deliberation of using District Plan and land use controls to strengthen the tools that are available to us increasing land resilience, not just a regional policy. Another consideration is the negative impacts of development on the decrease of resilience, how does the RPS address that?	Objective 29A was added to link increasing forestry for C sequestration to co-benefits; one of which is erosion control. Because the Soils chapter is not being reviewed this was a bit of an outlier as not looking at pols such as Ngati Toa are suggesting. We've subsequently deleted objective 29A and redrafted as a CC objective. The policies include a reg policy pointing to regional council and a non-reg policy, which should be given effect to by TAs too.
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 2:	Decision requested: The new addition to the policy where existing industrial and trade premise consent holders to demonstrate a reduction in GHGs at consent renewal is encouraging as well as the phasing out the coal. However, we are unsure of the policy impact on our communities especially given that the transition required is not too far (2024). Having access to a warm and dry house in most instances could mean domestic fires. It will be costly to change this overnight. Another question this Policy also poses is how monitoring and compliance will be performed.	Accepted. Policy 2 is reworded to consider the impact on businesses and communities.
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 7:	Decision requested: The changes and amendments made in Policy 7 (a) and (a) (i) supporting a low or zero carbon system, Policy (i) (1), (2), and (3) are contributing to the status quo and might be doing more of the same. For instance, reducing fugitive GHGs from wastewater treatment plants and increasing the diversion of wastewater sludge, requiring efficient municipal landfill gas systems. The RPS policy intention could encourage practitioners to transition to new and innovative systems- not doing more of the same. Allowing a more efficient landfill could be seen as improvement, but the policy could re-shift focus on having no landfills.	Accepted. The amendments to Policy 7 and Policy 65 are to be read together. The policy position is to reduce waste and divert organic waste from landfill (residual waste). Policy 65 is to support and encourage new technologies and methods to divert organic waste and waste overall.
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 9:	Decision requested: The preparation of another plan (Regional Land Transport Plan) to give effect to Policy 9 dilutes the policy intent. It is unclear that as a higher order document, the RPS will be reconciled with a lower order document (Regional Land Transport Plan), which may not be binding, producing policies to give effect to policy 9. The wording also 'promotes reduction', it is more cost-effective to reduce than promote, and why promote while we can be more directive to 'reduce'.	The RLTP cannot 'require' and the RPS can only direct the RLTP to 'advocate', 'promote' or 'support'. Eg. the RLTP can have a policy that advocates but GW are not responsible for delivering. MoT is responsible.
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 10:	Decision requested: Detailed travel demand management plans would help us make aligned decisions while land use is being planned. The production of a travel demand management plan will be time and resource intensive. It is unclear, undertaking such exercise, just to 'promote' the reduction of using on-renewables and GHG emissions justifies the time and resource required to complete these plans. It is unclear whether they are secondary decision-making documents; should they be prepared to produce evidence for our reductions, or because they offer opportunity to change the way land is used, should they be directive rather than promotional and optional.	Policy 10 was existing policy. Now deleted on advice of the GW transport team.
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 11:	Decision requested: <i>Policy 11</i> can be more directive in allowing District Plans to use more directive words for energy efficient designs for all new development.	Noted. Policy 11 is connected with the Building Act and the requirements for energy efficient design. The district plan promotes these design elements and cannot require them through the RMA.
4.1 Regulatory policies - direction to district and regional plans	Policy 12:	Decision requested: This policy does not make clear whose objectives that we are setting our vision for. Tangata Whenua objectives are not the same with the communities', the Crown's, or the Councils'. There are not clauses that mention Mana Whenua identifies Freshwater Management Units (FMUs), environmental flows, environmental outcomes, and limits co-designing with the Council. All sub-clauses could be re-phrased to say	Agreed addition made

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and the Regional Land Transport Plan		'co-designed with Mana Whenua '. FMUs need to align with Sites of Significance to iwi and Māori, and this has not been mentioned or referred to in this Policy.	
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 14:	Decision requested: It is worthwhile to consider whether this policy could also be included in District Plans, not just the Regional Plans. The word 'manage' is not ideal as it refers to a world that we may never reduce the contamination. It is not appropriate that, with this wording we are required to accept some form of contamination to constantly occur. It is ideal that the policy intent reflects the contamination from stormwater will be phased off because we have rules and provisions in place that we stopped the contamination to reach to our rivers, ocean, and wetlands. New and existing subdivision and development (their regulation mostly covered by District Plan clauses) should not allow para water reaching to our precious freshwater environments, in which some of them are severely contaminated already.	Policy FW1 covers district plans. Policy has been completely reworded
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 15:	Decision requested: It is worthwhile to consider whether this policy could also be included in District Plans, not just the Regional Plans. The word 'manage' is not ideal as it refers to a world that we may never reduce the contamination. It is not appropriate that, with this wording we are required to accept some form of contamination to constantly occur. It is ideal that the policy intent reflects the contamination from stormwater will be phased off because we have rules and provisions in place that we stopped the contamination to reach to our rivers, ocean, and wetlands. New and existing subdivision and development (their regulation mostly covered by District Plan clauses) should not allow para water reaching to our precious freshwater environments, in which some of them are severely contaminated already. By using the word 'managing' we are accepting and acknowledging the effects of earthworks and vegetation disturbance instead of avoiding these activities to achieve the target attribute states for water bodies and freshwater ecosystems.	The policy does cover district plans. Manage is appropriate in a limits regime. Target attribute states must be achieved
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 17:	Decision requested: This policy contradicts Te Ao Māori view that humans do not sit at the centre of Taiao and take and use of water is just for health needs of the people. The policy detail that says 'providing for the health and wellbeing of water bodies and freshwater ecosystems' in a way covers this view but also contradictorily says the 'health needs of people ahead of any take and use for other purposes while providing for...'	Agreed. Policy redrafted.
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 18:	Decision requested: The policy seems to be strengthened by using the word 'avoid' in the Policy 18 (e), (f), (g), (h) and (i) maintaining the fish passages. It is unclear, though, if the policy intention is being levelled down with the word use of 'promoting' in the clause (a), (b), (c), and (d).It is unclear whether the hierarchy of these clauses are considered; where 'avoidance' should be emphasized more than the 'promotion' side of the Policy 18 whether should the 'avoiding' clauses be coming first before the less directive clauses. The wording 'promote' could be rewritten into 'ensure' or 'give effect to' and rendered to a more impactful and directive policy wording instead of promoting. This will balance the priorities targeted within this policy; 'avoid' and 'ensure' reflects better of the intention of the Policy 18. This Policy could apply to regional plans and the district plans.	Some wording changes. Policy applies to regional plans only. District plans covered by policy 40
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 23:	Policy 23 and Policy 24 identifying and protecting Significant Natural Areas (SNAs) are a critical part of the RPS. It is concerning these values to be identified by June 2024. Policy 23 and 24 have been in effect for a long time and is not ideal some Councils have not given effect to these Policies and / or gave effect partially, either to include just Public SNAs and leaving out the private land areas. It is crucial that councils that are tentatively holding space for these policies implement Policy 23 and 24 since District Plans to map, identify the SNAs, and undertake public consultation, and finally performing plan change to give effect to SNAs protection in the form of provisions are long processes that jeopardise the protection of SNAs. An important development that involves the implementation of Policy 23 and 24, is the Ministry for the Environment released the exposure draft for the National Policy Statement Indigenous Biodiversity (NPS-IB). This means there will be further policy implications to Regional Plan and District Plans. Since the exposure draft is accepting public submissions, it will be sometime for policies to take effect then to be implemented in	Noted. Adding date to Policy 23 retained – but have extended to 2025 recognizing need to arrange resourcing.

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		Regional and District Plans. The intention of Policy 23 and 24 becomes more important where all Councils are about to give effect to National Policy Statement-Urban Development (NPS-UD) prioritising housing and development needs. It is critical that SNAs are provided protection in this uncertain environment where the Councils still to give effect to NPS-IB but will give effect to NPS-UD before National Policy Statement - Freshwater Management (NPS-FM) and NPS-IB start to take effect providing protection for our freshwater and indigenous ecosystems. Note that these NPSs are not synchronised, it is imperative Policy 23 and 24 ensures the Plan is given effect as soon as practicable.	
4.1 Regulatory policies	Policy 29:	It is positive to see a stronger wording of Policy29 and the intent of the policy is supported as the new wording provides. It is unclear of the Policy that specifies 'manage subdivision, use and development where the risks are low and tolerable'. The management of low and tolerable risks suggests that we might deal with cumulative effects if development is allowed in such areas. It could also mean for those who interpret the Plans where these areas are not necessarily discouraged and that we have confidence the cumulative and unknown impacts can be managed. It is unclear in this policy what tools and management options we would have that would help managing the subdivision, use and development in those areas.	Have reworded the policy to use the more widely understood terms of low, moderate, high and extreme to bring the terminology in line with more widely used risk assessment matrices and analysis metrics. The policy is intended to support the development of rules in city and district plans that consider cumulative effects. The risk based approach promoted in this policy for natural hazards management has been used in the PCC district plan review.
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 31:	This policy does not mention the role of intensification and greenfield development interaction, and this may not recognise the land development trends and nuances that every city in the Greater Wellington region is going through. In Porirua, Porirua PDP Future Urban Zone (FUZ) suggested large areas of greenfield development including central government fast track greenfield development projects such as, the Plimmerton Farms. This means Porirua will gear up for quite a number of housing projects, supplied with greenfield development as well as giving effect to Government's NPS-UD requirements of intensification and densification. This policy is not clear where the intensification is expected to be covered by brownfield development and whether greenfield development is considered as part of intensification. This will have repercussions for the environment. It is unclear that Policy UD.1 Enabling intensification - district plans is kept separately as the policy intention could have been included in Policy 31.	While this policy is specific to intensification/building height and density, it does not work in isolation, it also requires the development to contribute to the qualities and characteristics of well-functioning urban environments as outlined in Objective 22. New urban areas (including both greenfield or brownfield) must also be considered under Policy 55 which gives direction on minimum requirements, including managing effects on the natural environment and other significant values identified in the RPS (including values of significance to Tangata Whenua). Policy 55 also requires consideration against the Wellington Regional Growth Framework of the Future Development Strategy which sets out the strategic and spatial direction. There has been changes made to the policy to provide better clarity.
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.2:	Decision requested: The policy intent of asking territorial authorities to prepare travel demand management plans is unclear. What does preparing travel demand management plans look like and whether this distracts the local authorities to execute zero carbon policies? Because producing such plans will take time, resources and requires robust evidence. It is unclear also whether producing these plans will bear any additional costs to communities and whether this can be done in a more efficient way through a resource consent application. It is unclear, the word 'minimising' in the policy refers to District Plan minimising the reliance on private vehicles, or developers are required to prepare travel management plans so that they can provide a plan on how their development promotes and enables a zero carbon travel framework.	Hopefully attempt at making the policy clearer who is being asked to develop a TDMP and who is being asked to develop the thresholds resolves this concern.
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.3:	The policy intention is supported however, the policy wording 'ensure' is not strong enough directing district plans to integrate environment in urban development. This policy could give stronger direction to District Councils that the policy is implemented in rules and standards.	Accept Ensure has been amended to provide for.
4.1 Regulatory policies - direction to district and regional plans and the	Policy CC.6:	Decision requested: It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this. The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans.	Planting trees is just one example of a Nature-based solution. Other provisions such as policies CC.7, CC.12, CC.14 and Methods CC.6 and CC.9 promote and support these Note that CC.2 is focused on regional councils. Consideration policy which applied to both region and districts has been deleted

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Regional Land Transport Plan		For Policy CC.7and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy. It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.	
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.7:	Decision requested: It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this. The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy. It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.	Planting trees is just one example of a Nature-based solution. Other provisions such as policies CC.7, CC.12, CC.14 and Methods CC.6 and CC.9 promote and support these Note that CC.2 is focused on regional councils. Consideration policy which applied to both region and districts has been deleted Method CC.6 – Regional council will lead this work in partnership with mana whenua. District councils expected to consider and manage impacts on sites that provide NbS
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.8:	Decision requested: It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this. The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy. It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.	Planting trees is just one example of a Nature-based solution. Other provisions such as policies CC.7, CC.12, CC.14 and Methods CC.6 and CC.9 promote and support these Note that CC.2 is focused on regional councils. Consideration policy which applied to both region and districts has been deleted Method CC.6 – Regional council will lead this work in partnership with mana whenua. District councils expected to consider and manage impacts on sites that provide NbS
4.1 Regulatory policies	Policy IE.1	Decision requested: The clause (a) of this Policy, that the offsetting should not be applied if the species or ecosystems are threatened, or the ecosystem is uncommon is supported. It is unclear how the clause (b) come to the number 'at least 10%'. How do we identify the benefits of and understand the results of 10%? How do we make sure that the biodiversity compensation is adequate or enough to protect what we want to protect? Given that most of the species and ecosystems in Greater Wellington, in part, are limited, in danger or threatened, we are unsure the biodiversity value loss and gain can be in balance.	Support noted 10% uplift explained in s32 Appendix 1A identifies what those threatened species are in the Wellington Region
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy IE.2	Decision requested: This policy is a pleasant improvement from the current framework that the RPS provides for. Clauses (a), (b), and (c) allows Mana Whenua to exercise their rights, and these clauses can be strengthened. District and regional plans can only provide a Mātauranga framework when iwi desires to share this framework as it applies to indigenous biodiversity. This clause to say: partner with iwi to apply a mātauranga Māori framework for the management and monitoring of indigenous biodiversity' would be better. Clause (b) should not say actively involve as Tangata Whenua holds the kaitiakitanga status; they will plan, decide, and monitor how indigenous biodiversity is tracking. Kaitiaki Monitoring Framework should be included here and be binding for District and Regional Plans. These Plans should spell out how the monitoring will be applied. Clause (c) is not clear whether the (c) is allowing Mana Whenua to access and use indigenous biodiversity. This could be reworded to say Mana Whenua has access and use rights, and District and Regional Plans should acknowledge these rights and set up processes to ensure that their access and use are not limited and restricted in any way.	Support noted Amendments made for clarification

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4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy EIW.1:	<p>Decision requested:</p> <p>The intent of the policy is supported - however we are conscious a variety of infrastructure is needed to be present to align, to make this happen. <i>Without needing to own a private vehicle</i> is a significant statement, where for affordable high quality active mode and carshare infrastructure, and public transport services may not be available for our communities. We need to ensure that the policy intention is not disadvantaging our communities. This might be reworded to say: <i>Regional Land Transport Plan should provide detail frameworks how this can be implemented with iwi partners and ensure a detailed co-design is worked with Tangata Whenua.</i></p>	Not reflected. RLTPs are directed by the Regional Transport Committee which is established under s105 of the LTMA. There are minimum requirements in the LTMA s18G. The committee comprise GWRC and district councils elected members, and KiwiRail and Waka Kotahi. The Regional Transport section the GWRC would like to use a separate process, and guided by Te Hunga Whiriwhiri for working with mana whenua.
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.1:	<p>Decision requested:</p> <p>The wording of the clause (b) takes away from the strength this Policy is anchored on. This could be rewritten to make the policy intent firmer for District and City Councils to say: '<i>...shall use Water Sensitive Urban Design in the design and construction of urban development</i>'. The clause (c) is using the word 'minimise' which does not have teeth when it comes to rules in the district plans, and their implementation. This clause caveats the land contours and extent practicable; it is unclear what triggers (rules) District Plans would have, this to be implemented. Most of the land is on challenging contours in Wellington and on hills that need to be cut out for feasible development to occur. Any mitigation that might be possible for flatter regions such as, Waikato or Auckland, may not be realisable, possible, or feasible in Greater Wellington. The policy should acknowledge and change the wording to say, <i>if it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place.</i> In summary, the policy contradicts itself because minimising earthworks in Wellington may not be able to be an option in some instances due to topography and soil conditions. The drafting intent of Policy FW.1 (f) is optimistic to reflect achieving multiple gains for stormwater management. In our built / urban environments, we observe the multiple issues of our stormwater network which won't be able to achieve the intent of this Policy. The policy should ensure there are stormwater-basics and bottom lines are achieved- not compromised then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention. The policy should focus on absolute musts of stormwater management and land development and acknowledge in the absence of standards and bottom lines, delivering other aspects may be a luxury. The policy needs to ensure the stormwater system provides safe and clever solutions to our communities then the rest, multiple positive outcomes, will come. The policy also needs to acknowledge the need of additional infrastructure to be able to give effect to this Policy.</p>	Noted. Changes made to require WSUD. Minimising extent of earthworks is appropriate when coupled with requirements to achieve target attribute states and limits
4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.2:	<p>Decision requested:</p> <p>Developers are required to make financial contributions to subdivision and development as a condition of their consent, ensuring that there is treatment for stormwater. It is commonly mentioned that these contributions have not been enough in the past and can only deliver less than ideal systems when it comes to stormwater systems. We are aware that Councils are geared up for reviewing their Financial Contribution policies as to identify what constitutes a 'fair contribution'. This policy could be reworded; instead of 'how a fair share of the cost is determined, and the nature of the contribution' it could focus on a realistic calculation of proposed development's greater connection with the current and existing infrastructure as well as the burden that it will lay on this infrastructure. It is unproductive for development contributions to just focus on the site-based stormwater systems instead of looking at the whole system and its connections. We have seen yet again many examples in Porirua, a development does not just have impacts where it is located but need to be considered within its overall downstream and upstream environments in the whole catchment and the infrastructure associated with it. We currently do not have well established systems to cope with existing loads regarding stormwater and wastewater overflows, let alone the needs of new subdivisions and development.</p>	Noted. Some changes made to make clearer
4.2 Regulatory policies - matters to be considered	Policy 39:	<p>Decision requested:</p> <p>Most regionally significant infrastructure is located where iwi and Tangata Whenua has sites of significance or cultural redress in their Treaty Settlement Claims Act. This consideration of Policy 39 should not clash implementing iwi's rights of Tino Rangatiranga and should not be interpreted in a way that the need for infrastructure does not recognise the rights and interests associated with the proposals. If there is such prospect of this happening, going forward should be co-</p>	Noted. Presently, we consider than there are sufficient provisions in the RPS and in regional and district plans to protect site of significance as part any Treat Settlement Claim. The amendments to Policy 39 have not changed the outcome of the policy. New Policy UD.1 also provides for enabling Mana Whenua to exercise their Tino Rangatiranga.

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		designed with Tangata Whenua and iwi. This link between the sites and areas of significance and regionally significant infrastructure is crucial.	
4.2 Regulatory policies - matters to be considered	Policy 40:	Decision requested: Policy 40 is important to consider when evaluating consents however it is challenging to identify how developers and land users will implement these considerations and how the impact of Policy 40 (a) is assessed. The Policy requires that water quality, flows and water levels and aquatic habitats of surface water bodies are 'managed in a way that gives effect to Te Mana o Te Wai' it is unclear how this will be achieved. One other question related to this matter is that if an integrated view to water and a whole catchment approach is aimed at in this consideration, why this Policy only includes surface water bodies. Couldn't a development and land use activity negatively impact the groundwater?	At the consent level the most important consideration is ensuring the hierarchy of obligations is applied to decision making. Changes made so that it is clear all waterbodies are covered
4.2 Regulatory policies - matters to be considered	Policy 41:	Decision requested: From this a good segue way is, <i>the Policy 41 Controlling the effects of earthworks and vegetation disturbance - consideration</i> as per the comments above, 'minimising' can be strengthened to say controlled or avoided. We agree that this needs to be a consideration.	Agree
4.2 Regulatory policies - matters to be considered	Policy 42:	Decision requested: 'Minimising contamination' is not adequate wording for the intention of the Policy. It is ideal this consideration to Policy 42 is reworded to say, no contamination in stormwater.	Removed. Some contamination (but within limits) will always occur
4.2 Regulatory policies - matters to be considered	Policy 43:	Decision requested: How do we identify resource consents' ability to demonstrate the 'contribution to achieving environmental outcomes and target attribute states for water bodies and freshwater ecosystems'? There is need for resource consents to show the environmental progress they are demonstrating in the application and proposal. It is unclear how this would be evaluated. Even in the cases of drafting clauses in consents, may not be doing much- what is our benchmark and how do we measure and label what is an ecosystem achievement? The consideration may not provide applicants and consent processing staff enough clarity and certainty to describe what is a contribution. Contribution as a word can be stronger; if this is a consideration it needs to match its empowering qualities and the level of higher order policy execution.	Policy 43 Deleted. Amendments made to Policy 18 and 40
4.2 Regulatory policies - matters to be considered	Policy 44:	Decision requested: This consideration needs to consider the needs of iwi and Māori and should be able to give flexibility to the needs of Mana Whenua.	Additional words added
4.2 Regulatory policies - matters to be considered	Policy 51:	It is important to support this policy as a consideration and appreciate the detail that it goes into covering all the potential issues we experience from natural hazards. It is noticeable there are water quality and overflow issues with our three-water network and flooding exacerbates these issues, and further making them more hazardous by the floods. There are not any connections created in the Policy 51. Yet this is an important consideration for Tangata Whenua. Clause (i) includes moderate risks; it is not convincing, if the risk is moderate, the Policy should not automatically allow that subdivision, use and development. Only if the risk is low then this could justify a mitigation if the hazard occurred. Clause (ia) is not clear; District Plans are responsible to make rules, making sure that the developments do not block the overland flood paths; do we consider the RPS should mention this, too? What policy gap this is looking into addressing or is it doubling up? It is unclear whether the clause (j) was too conservative, taking into account 1 in a 100-year flood as we are seeing them more often in the face of worsening impacts of Climate Change and global warming.	The policy approach for natural hazards in the RPS is 'all hazards' including stormwater and surface flooding. There is a direction in the plan change to more specifically incorporate environmental values and principles of Te mana o te Wai. In addition, there are specific stormwater policies that address the issue of contamination. Have reworded to include 'risk' in clause (i) that allows and assessment of the type of activities that may be considered acceptable in moderate hazard areas where the risk to the development could be considered low to moderate or reduced to that through design adaptation. 1:100 year or 1% annual recurrence interval (ARI) planning for hazards is an accepted risk management approach. If the ARI changes over time as a result of climate change, then the direction in the RPS is to adapt likewise in order to maintain resilience and minimise the impacts.
4.2 Regulatory policies - matters to be considered	Policy 52:	Some of the new additions to the policy are encouraging, such as the long-term viability; no increase in risk to adjacent properties, and adverse effects on Te Mana o Te Wai, Te Mana o te Taiao, and that they are considered as part of the consent applications. However, the impacts of hazard mitigation measures to be minimised: these mitigations do alter the site and change the environment in ways that we cannot bring it back.	The first clause in this policy has been deleted to avoid confusion over its use. Minimise is included to signal the direction to keep impacts as low as reasonably practicable. In some instances, hard protection works are unavoidable or are required to maintain

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		<p>The wording of the first clause (a)'justifiable', for instance is a subjective word and all flood hazard structures are justifiable at some point in time and that this may not be able to be evaluated from an objective perspective. Policy 52 does not elaborate how consent planner will make their assessment. Same with the cumulated effects, how these are assessed are important and may be made on some judgement and value points.</p> <p>The word 'minimise' still leaves policy door open for those who are inclined to think bringing hard engineering structures to the scene is the ultimate answer.</p>	<p>existing structures. So a consenting pathway needs to be available for these situations. The policy is very clear about the need to avoid structural protection works unless they are necessary to protect existing development, regionally significant infrastructure or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future.</p> <p>In many cases, during consent applications, there are expert assessments across these points including cultural impact assessments. They are undertaken to be commensurate with the size and scale of the application.</p>
4.2 Regulatory policies - matters to be considered	Policy 55:	<p>Decision requested:</p> <p>In clause 7, suggest delete the word 'recognise' and just keep the provide for to strengthen the intention.</p>	<p>"recognise and provide for" has been used to ensure it is consistent with Policy 49. We couldn't delete recognise without being inconsistent with other direction (policy 49 would also need to be amended).</p>
4.2 Regulatory policies - matters to be considered	Policy 56:	<p>Decision requested:</p> <p>Mana Whenua and iwi have land in rural areas that was returned through the Deed of Settlement Acts. Policy 56 consideration needs to include the execution of Tino Rangatiratanga on this land and to be able to allow the land aspirations of iwi and Māori is accounted for.</p>	<p>Accept in part</p> <p>This point is accepted; but this has been reflected in Policy UD.2.</p>
4.2 Regulatory policies - matters to be considered	Policy 58:	<p>Decision requested:</p> <p>The part of the Policy 58 that says 'ensure all new urban development including form, layout, location, and timing is sequenced in a way that...' seems to belong to the 'responsive planning' section of the RPS. Co-ordinating land use with development and operation of infrastructure is not just about transport as specified in clause (b).</p>	<p>This does also apply to any responsive planning. This policy would sit alongside UD.4.</p>
4.2 Regulatory policies - matters to be considered	Policy CC.9	<p>Decision requested:</p> <p>This clause should apply all policy in the RPS, not just to Climate Change parts. Inter-racial and inter-generational equity is impacting iwi and Mana Whenua differently as far as Climate Change impacts.</p>	<p>It is an overarching policy and applied across the RPS chapters.</p>
4.2 Regulatory policies - matters to be considered	Policy CC.15:	<p>Decision requested:</p> <p>Does this policy cover methane emissions from landfills?</p>	<p>No – that is addressed by the waste policies</p>
4.2 Regulatory policies - matters to be considered	Policy FW.3:	<p>Decision requested:</p> <p><i>Policy FW.3 Implementing Te Mana o Te Wai in urban development - consideration</i> is supported; clauses of (i) and (l) can be strengthened by rewording. Instead of minimising earthworks extent and volume of works, this could mean to say performing earthworks, will need to be justified as to when they are absolutely needed. Identifying and mapping streams also need to be done as part of the stormwater and related-infrastructure investigations, that are attached to the consent application. This consideration could be strengthened to say no negative impact will occur in the identified and mapped streams.</p>	<p>FW3 no longer in plan change. Has been folded into a new Policy 42</p>
4.2 Regulatory policies - matters to be considered	Policy IE.3:	<p>Decision requested:</p> <p>It is confusing mana whenua roles and values are recognised in this particular policy and given consideration for a resource consent, however in other parts of the RPS we do not see them. Policy 49 has connections to Policy IE.3 and all taonga will need to be linked to a kaitiaki monitoring framework; it is confusing why the plan picks out a regime of giving effect to mana whenua values and roles particularly managing indigenous biodiversity but not other parts of the Plan.</p> <p>Policy 49, in a way, explains it to extend the policy intention to fresh and coastal waters in the clause (b) and the exercise of kaitiakitanga in the clause (a) however this comes through as fragmented. The word 'recognised' can be strengthened, we suggest removing this wording and leave it with providing for.</p>	<p>Reflects the fact that this is only a partial review. Policy 49 still gives direction for other topics to recognise and provide for iwi values – requires full plan review to fully address</p>
4.2 Regulatory policies -	Policy IM.1:	<p>Decision requested:</p> <p>The policy ensures the involvement of mana whenua in resource management and decision making. It incorporates a more holistic view of the environment and its interconnectedness. There might need to be</p>	<p>Addressed by inclusion of (e) and (f), a well as the accompanying method.</p>

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matters to be considered		further clarification that making decisions based on mātauranga Māori need to be informed by mātauranga Māori knowledge holders. In terms of sharing data and information across all relevant agencies it should be specified that mātauranga Māori data sovereignty will be upheld, and Māori decide when their knowledge is shared.	
4.2 Regulatory policies - matters to be considered	Policy IM.1:	Decision requested: How does this Policy and its consideration working the greater context for the Regional Policy Statement?	Noted
4.2 Regulatory policies - matters to be considered	Policy UD.3:	The consideration of this policy should apply to all tangata whenua sites of significance and other land that has been given back/ returned to iwi. Some of these lands that are returned to Tangata Whenua,iwi would have a raft of different values associated to the whenua and the values will be dynamic -can change over time. Urban Development provisions need to recognise these values and that recognise they will play out differently indifferent sites and Papakāinga should not be negatively impacted in the face of intensification and densification proposals, and this could be addressed when considering resource consent applications. This may need to extend to other taonga and sites and areas of significance, awa and moana and important places where iwi still practice cultural matāuranga.	Accept The proposed changes to both UD.2 and UD.3 have broadened from marae and papakāinga and provide further direction on how they are to be provided for and managed.
4.2 Regulatory policies - matters to be considered	Policy UD.4:	The responsive planning section does not refer to three waters and stormwater. This has been mentioned generally in the clause (d) referring that required development infrastructure can be provided effectively and efficiently for the proposals. This does not say anything about whether it can be provided at all effectively or efficiently.	This is still provided, but rather through Policy 58 for the sequencing of development with infrastructure.
4.5.2 Non-regulatory methods - information and guidance	Method 17:	Decision requested: It is not clear what has changed from the previous method in terms of outcomes. The wording seems that it could be strengthened. The intention of the method is not clear in the drafting; promoting and assisting actions on waste management does not seem to be targeted at what activity they are aiming for - and it is a generic statement that may not find its audience. Could this phrase be changed to say, 'ensure waste management's impact on the environment are removed gradually within the limitations of our current waste management systems'. The methods outlined are targeted at supporting District and City councils? Ideal to clarify what authority this will apply.	Method 17 has been strengthened to require working in partnership with mana whenua / tangata whenua and with city and district councils, the waste management sector, industry groups and the community to reduce waste overall, and in particular reduce waste that generates greenhouse gas emissions.
4.5.3 Non-regulatory methods - integrating management	Method 32:	Decision requested: The content covered in the Method 32 is supported, however it is not clear the intention of the drafting in some places, such as, 'engaging with stakeholders, landowners and community'. This method could emphasize 'co-design of actions, policies and implementation' -it is not an exercise just regarding sites of significance to iwi and Māori.	Amended
4.5.3 Non-regulatory methods - integrating management	Method 34:	Decision requested: No mention of iwi and tangata whenua in these methods and how they impact iwi, hāpu and Māori.	Additions made
4.5.3 Non-regulatory methods - integrating management	Method CC.5:	Decision requested: Under the central government direction, how can Regional Councils achieve emission reductions from agriculture? Is this method, just limited to reviewing the regional response, which means reviewing land use emissions impact? It is not clear.	A review is proposed as the policy space is very unclear at the moment: <ul style="list-style-type: none"> - Central Government is to make a decision as to how reductions in agricultural emissions will be achieved by the end of 2022. - MFE is to provide guidance on regional and TA responsibilities to address GHG emissions under the RMA before Nov 2022 The RPS policy approach sets a minimum expectation and it is appropriate to review this once the government direction and results of initial GW action are clearer.
4.5.3 Non-regulatory methods - integrating management	Method FW.1:	Decision requested: It is not clear what role Tangata Whenua has in this process.	The role of Tangata whenua is the same in joint processing

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4.5.3 Non-regulatory methods - integrating management	Method FW.2:	Decision requested: As a method, it does not say much about the involvement of Tangata Whenua. This could be something that Tangata Whenua would want to co-design.	Agree. Additions made
4.5.5 Non-regulatory methods - providing support	Method IE.3:	Decision requested: This is connected throughout the plan; kaitiaki monitoring is not intended just for biodiversity; the theme needs to spread throughout all areas of taiao. It has not been consistently applied the same language provided here in this method as it needs to be coming across all the RPS. The word 'support' mana whenua can be redrafted to say, 'ensure Mana Whenua has sufficient resources to establish a mana whenua kaitiaki monitoring programme to monitor the health of the region's indigenous biodiversity.' Note that comments made above, the kaitiaki monitoring does not just apply to indigenous biodiversity and the method should speak to how this is incorporated to the GWRC monitoring frameworks.	Will need to be part of full RPS review in 2024
4.5.3 Non-regulatory methods - integrating management	Method UD.1:	No mention of iwi and tangata whenua in these methods and how they impact iwi, hāpu and Māori.	While we haven't provided the specific detail in the method, this is provided for through subpart 4 of the NPS-UD. This also outlines the engagement process that is required.
4.5.3 Non-regulatory methods - integrating management	Method UD.2:	No mention of iwi and tangata whenua in these methods and how they impact iwi, hāpu and Māori.	Accept This has been added and relates back to the addition to Policy 67(f).